

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

TODD CLEAVENGER, et al.,	)	CASE NO.: 5:21-CV-00557
	)	
Plaintiffs,	)	JUDGE: BENITA Y. PEARSON
	)	
vs.	)	<b><u>BARBERTON DEFENDANTS' MOTION</u></b>
	)	<b><u>FOR EXTENSION TO ANSWER</u></b>
CITY OF BARBERTON, et al.,	)	<b><u>AMENDED/SUPPLEMENTAL</u></b>
	)	<b><u>COMPLAINT</u></b>
Defendants.	)	

Now come Defendants, City of Barberton, William Judge, Vince Morber, Robert Russell, Brian Davis, Robert Mingle, Michael Green, Lisa Miller, and Herbert Shields, by and through counsel Mazanec, Raskin & Ryder Co., L.P.A., and respectfully move this Court for an extension of time of thirty (30) days by which to answer, mover or otherwise respond to Plaintiffs Amended/Supplemental Complaint. Counsel for said Defendants has recently filed a Notice of Submission of the Plaintiffs' "Notice of Dismissal" which Plaintiffs' filed in the state court. (ECF 13). As a result of that submission, Defendants anticipate that this matter is likely to be dismissed. Defendants have previously been granted no enlargements of time for a total of – 0 – days.

This motion is not interposed for the purposes of harassment or delay. Instead, Defendants seek this extension to permit the Court to address Plaintiffs' "Notice of Dismissal". In view of the foregoing, Defendants, City of Barberton, William Judge, Vince Morber, Robert Russell, Brian Davis, Robert Mingle, Michael Green, Lisa Miller and Herbert Shields respectfully request this

Honorable Court grant them an extension of time of thirty (30) days through and including May 26, 2021, within which to move or plead to Plaintiffs' Amended/Supplemental Complaint.

Respectfully submitted,

MAZANEC, RASKIN & RYDER CO., L.P.A.

*s/Terence L. Williams*

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Counsel for Defendants City of Barberton, William Judge, Vince Morber, Robert Russell, Brian Davis, Robert Mingle, Michael Green, Lisa Miller and Herbert Shields

**CERTIFICATE OF SERVICE**

I hereby certify that on April 26, 2021, a copy of the foregoing Barberton Defendants' Motion for Extension to Answer Amended/Supplemental Complaint was filed electronically. Notice of this filing will be sent to all registered parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

s/Terence L. Williams

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TRAVR-210034/Ds MFE to Answer Amd/Supp Compl